

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

BRITTNEY FELDER,

Plaintiff,

v.

MGM NATIONAL HARBOR, LLC, *et al*,

Defendants.

Case No. 8:18-cv-03405-PJM

MOTION FOR EXTENSION OF SCHEDULING ORDER DEADLINES

Defendant MGM National Harbor, LLC. (“National Harbor” or “Defendant”) hereby submits this Motion for Extension of the Scheduling Order Deadlines and moves this Court for a 60-day extension of each of the remaining Scheduling Order deadlines. In support of this Motion, Defendant states as follows:

1. The Parties are actively engaged in discovery. They have each propounded written requests for production and interrogatories. As of the filing of this Motion, both parties have responded to one another’s written discovery.

2. There have, however, arose numerous issues related to the Parties’ respective responses and document productions that require additional time to work through.

3. On December 6, 2022, Plaintiff filed a Motion to Compel Defendant to serve responses to Interrogatories, which Defendant believes is now moot given that it served its responses on December 7, 2022. That said, given the Parties’ course of dealing to date, Defendant anticipates that the Parties will need time to meet and confer on the written responses.

4. Further, Plaintiff served one hundred and twelve (112) separate requests for documents, many of which contain multiple bulleted sub-requests. Although Defendant maintains

that many of these requests are overly broad, not proportional to the needs of this case, and/or not in any way related to or necessary for resolving the one cause of action which remains – wrongful termination based on color – Defendant is diligently conducting searches of its documents, archived communications, and speaking with individuals with knowledge about the relevant events, which took place nearly five years ago.

5. Defendant understands its obligation to conduct reasonable searches for documents and to supplement its production on an ongoing basis. It simply needs more time to do so and to work out any and all disputes with Plaintiff.

6. Defendant therefore asks that the Court extend the discovery period and all other deadlines currently on the Schedule by sixty (60) days.

7. Defendant submits that there is good cause to extend the remaining Scheduling Order deadlines by 60 days. The requested extension is reasonable based on the circumstances and is not expected to unduly delay proceedings in this case or unfairly prejudice either party. It is also expected to serve the interests of justice and judicial economy by giving Defendant the additional time it needs to conduct discovery, and by giving the Parties additional time to resolve their pending discovery disputes, and by ensuring that the Parties can complete discovery with all pertinent documents and information at their disposal.

8. This is the first request to modify or extend the Scheduling Order deadlines in this case.

9. On December 6, 2022, Defendant sought Plaintiff's consent for the relief in this Motion, but Plaintiff declined to consent.

10. A proposed order is attached.

11. If this Motion is granted, the new deadlines will be:

March 3, 2022: Discovery deadline; submission of status report
March 10, 2023: Requests for admission
March 31, 2023: Dispositive pretrial motions deadline

WHEREFORE, the Defendant respectfully requests that this Court enter an order extending the remaining Scheduling Order deadlines by 60 days.

Dated: December 7, 2022

Respectfully submitted,

JACKSON LEWIS P.C.

By: /s/ Jeremy S. Schneider
Jeremy S. Schneider
Desireé Langley
10701 Parkridge Blvd., Suite 300
Reston, Virginia 20191
Telephone: (703) 483-8300
Fax: (703) 483-8301
Jeremy.Schneider@jacksonlewis.com
Desiree.Langley@jacksonlewis.com
Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 7, 2022, a true and accurate copy of the foregoing was electronically filed with the Clerk's Office using this Court's CM/ECF system and served upon the following:

Brittney Felder
6902 Forbes Blvd
Seabrook, MD 20706-2160

/s/ Jeremy S. Schneider
Jeremy S. Schneider